

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WILLIAM FRANCIS, JR.,

Plaintiff,

v.

WARDEN THOMAS CARROLL,
CORRECTIONAL MEDICAL SERVICES, INC.,
STAN TAYLOR, and JOYCE TALLEY,
Defendants.

)

)

) C.A. No. 07-015-JJF

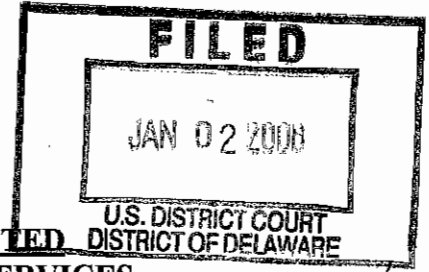
) JURY TRIAL DEMANDED

)

)

)

)



PLAINTIFF'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS DIRECTED
TO DEFENDANTS CORRECTIONAL MEDICAL SERVICES

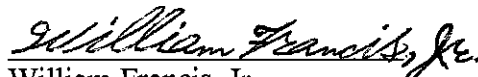
BD scanned

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, Plaintiff hereby requests that defendants produce for inspection and copying, the documents and tangible things identified below within thirty (30) calendar days of the service of this document request.

1. Any and all dental records, dental X-Rays, dental exams and results of and for plaintiff from January 1, 2004 through and including the date of your response to this request.
2. Any and all policies, procedures, regulations, instructions, notes, memoranda, internal communications, directives, executive orders and preceding and subsequent amendments in effect from January 1, 2004 through and including the date of your response to this request concerning periodontal disease treatment, surgery and consultation – in – patient and out – patient – services at the Delaware Correctional Center in Smyrna, DE.

3. Any and all notes, documents, letters, memoranda, files, records, record books, logs; grievance reports, dispositions and/or written communications and civil actions made, prosecuted, settled or filed against Correctional Medical Services regarding dental care services in every city and state in which it operates.
4. Any and all official documents verifying the insurance status of Correctional Medical Services from January 1, 2004 through and including the date of your response to this request.
5. Any and all documents which describe, detail or show the actual amount and percentage of funds spent on dental services for inmates as compared to total annual expenditures over the past five years.

Dated: December 27, 2007 Pursuant to 28 U.S.C. § 1746


William Francis, Jr.
SBI#00264560, W-1 Unit
Delaware Correctional Center
1181 Paddock Rd.
Smyrna, DE 19977

Certificate of Service

I, William Francis, Jr., hereby certify that I have served a true
And correct cop(ies) of the attached: Plaintiff's First Request For
Production of Documents upon the following
parties/person (s):

TO: Ryan M. Ernst
Attorney at Law
913 N. Market Street, Suite 800
Wilmington, DE 19801

TO: Office of the Clerk
844 N. King Street
Lock box 18
Wilmington, DE 19801

TO: _____

TO: Ophelia M. Waters
Deputy Attorney General
Carvel State Office Building
820 N. French Street, 6th Floor
Wilmington, DE 19801

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United
States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 28th day of December, 2007

William Francis, Jr., Plaintiff

IM William Franelis, Jr.

SBI# 264560 UNIT W-D-22

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977

Joseph J. Farnan, Jr.

c/o Office of the Clerk

844 N. King Street

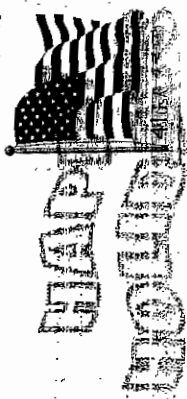
Lockbox 18

Wilmington, DE

19801

SOUTH JERSEY NJ 080

20 DEC 2007 PM 6 L



U.S.M.
X-RAY

1980143519

